

7.3.5.5 Fuel Management and Reduction of “Slash” From VM Activities

WSD Initiative Definition: *Plan and execution of fuel management activities that reduce the availability of fuel in proximity to potential sources of ignition, including both reduction or adjustment of live fuel (in terms of species or otherwise) and of dead fuel, including "slash" from VM activities that produce vegetation material such as branch trimmings and felled trees.*

In addition to describing the Fuel Reduction Program this section also addresses Action PGE-8 (Class B).

1) Risk to be mitigated/problem to be addressed:

PG&E’s Wood Management policies dictate how VM crews treat tree slash and debris created by VM work, including Routine VM, EVM, and emergency VM activities. Woody debris less than 4” in diameter is chipped or logged and scattered on the property in accordance with forest best management practices. Tree debris that is 4” or greater is left on the property once the wood has been made safe. PG&E leaves larger wood on site because it is considered property that may have value to the landowner. PG&E currently has no specific plans to change our Wood Management policies and thus the remainder of the discussion for this Initiative addresses the Utility Defensible Space (UDS) program.

In 2020, PG&E planned to pilot a fuel reduction program, often referred to as the Transmission UDS program, that focused on application of fire retardant around selected transmission towers where fuel reduction had been completed by some of our Transmission VM programs. However, PG&E could not implement this program because of pending additional environmental review including, but not limited to, product toxicological and environment analysis, efficacy analysis, and environmental planning and permitting.

In 2021, PG&E decided to shift the focus of the fuel reduction efforts of the UDS Program from our Transmission poles and towers to our Distribution facilities. Therefore, we now refer to this program as the 2021 UDS Distribution program. The goal of the program is still to reduce vegetation fuels close to potential sources of ignition. PG&E aims to remove dead fuels and to reduce, or adjust, live fuels to reduce the spread and intensity of fires associated with PG&E assets. The 2021 UDS Distribution program will target fuel sources underneath and adjacent to distribution powerlines in order to maintain wire and border zones. It will focus solely on the modification of fuels. At this time, the use of chemical fire retardant for proactive application as part of the 2021 UDS Distribution Program is still pending environmental review.

2) Initiative selection ("why" engage in activity) – include reference to a risk informed analysis on empirical (or projected) impact of initiative in comparison to alternatives

As explained above, the overall goal of the 2021 UDS Distribution Program is to

create “fire defense zones” to mitigate the spread of an ignition if one were to occur under or adjacent to PG&E powerlines while enhancing defensible space for communities, properties, and buildings.

Locations for fuel reduction work as part of the 2021 UDS Distribution Program will be identified during pre-inspections (PI), beginning with the 2021 EVM high-risk circuits. VM may also identify some locations not on the Vegetation Risk Model to successfully complete cohesive strategy projects. An emphasis will be placed on densely vegetated areas residing on high incline slopes.

For purposes of the 2021 UDS Distribution Program, “wire zones” will be defined as the horizontal distance of 8 on either side of our electric lines between two poles. “Border zones” will be defined as the horizontal distance from the edge of the “wire zone” out to 15’. These two zones combined create a wire and boarder zone of up to 15’ on each side of our electric lines. The wire and border zones will include the areas treated for this program; mowing brush, annual weeds, and grasses to a max height of 3”. Shrubs will be removed within the wire and border zones, if possible, or spaced and trimmed if removal is not possible.

All trees 12” in diameter or less, dead wood, and litter will be removed within the wire and border zones in areas identified for work as part of our 2021 UDS Distribution program. Finally, PG&E will work to modify ladder fuels by pruning trees left within the wire and border zones to achieve a minimum vertical distance from the forest floor or understory shrubs. The minimum vertical clearance from ground or understory vegetation is between 6’ and 15’ depending on slope.

3) *Region prioritization ("where" to engage activity) – include reference to a risk informed analysis in allocation of initiative (e.g., veg clearance is done for trees tagged as "high-risk")*

The 2021 UDS Distribution program will leverage the Vegetation Risk Model developed by the Asset Strategy team to identify sections of high-risk CPZs to identify projects for performing modification of vegetative fuels. Any projects identified outside the Vegetation Risk Model will be locations based on a combination of local knowledge and a cohesive strategy to work with CAL FIRE, USFS, and Municipalities on wildfire prevention initiatives.

In addition to what is stated above, and in alignment with VM processes, pre-inspection will take place on the circuits within the high risk ranked CPZs to identify the circuits with the most abundant flammable and incompatible vegetation to execute UDS activities.

4) *Progress on initiative (amount spent, regions covered) and plans for next year*

PG&E is still in the process of building a framework for the 2021 UDS Distribution Program. In 2020, different strategies were discussed and benchmarking with other utility companies was completed. Future work will target high- risk areas in all six regions based on the Vegetation Risk Model. There is no specific mileage target or budget for this work in 2021. However, this work in 2021 will be included in the 2021 EVM program (Section 7.3.5.15).

The use of chemical fire retardant for proactive application as a proposed aspect of the 2021 UDS Distribution Program is still pending environmental review. Completion of the environmental review is planned for the end of June 2021. Additionally, PG&E plans to implement an internal procedure related to the 2021 UDS Distribution program during Q4 of 2021. Please note, the 2021 UDS Distribution Program is still being developed within PG&E and the scope of the project is subject to change as we continue to make progress with this initiative.

5) *Future improvements to the initiative*

Incoming data will be used to determine effectiveness and risk spend efficiency of the 2021 UDS Distribution Program. In addition, PG&E will use incoming data to identify the most effective schedule and cycle time. As mentioned above, PG&E has completed benchmarking with other utility companies. PG&E will be one of the first utility companies developing an official fuel reduction program.

In addition, as part of our 2021 UDS Distribution Program, PG&E is evaluating the use of fire-retardant products to reduce risk of ignition from utility infrastructure. Traditionally, the use of fire-retardant chemicals has been limited to firefighting operations during active wildfires. PG&E is interested in land application of fire-retardant chemicals as a preventative measure to reduce potential ignitions related to utility infrastructure during extreme weather events in HFTDs. In the U.S., there is currently no single regulatory framework for the production, authorization and use of fire retardants. PG&E intends to conduct a review of commercially available fire-retardant products. This review will consist of the following:

- Product toxicological and environmental analysis
- Efficacy analysis
- Environmental planning and permitting initial assessment
- Scope of use including asset protection and proactive application

PG&E's review of fire-retardant chemicals will take place by the end of June 2021.